

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	
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	§	
SCOTT M. SEIDEL, TRUSTEE;	§	
GNET ATC, LLC; MULTIBAND	§	
FIELD SERVICES, INC.,	§	ADVERSARY PROCEEDING
	§	NO: 23-03036
Plaintiffs,	§	
	§	
v.	§	
	§	
JAMES FRINZI; FRINZI FAMILY TRUST;	§	
MULTIBAND GLOBAL RESOURCES,	§	
LLC,	§	
Defendants.		

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO  
MULTIBAND GLOBAL RESOURCES, LLC**

**TO: Multiband Global Resources, Inc., by and through its counsel of record, Debbie E. Green, Esq., McDermott Will & Emery LLP, 2501 North Harwood Street, Suite 1900, Dallas, Texas 75201.**

Scott M. Seidel, for himself and for GNET ATC, LLC and Multibrad Field Services, Inc., the plaintiffs in the above styled and numbered Adversary Proceeding, hereby serves the following Interrogatories (each an "Interrogatory" and collectively the "Interrogatories") on defendant Multiband Global Resources, LLC (the "Defendant") pursuant to Federal Rule of Civil Procedure 33, as follows.

## **I. INSTRUCTIONS**

The Defendant is hereby requested to serve written responses to the Interrogatories listed in Section III, using the instructions listed in Section I and the definitions listed in Section II, no later than September 11, 2023, at the following address:

Munsch Hardt Kopf & Harr, P.C.  
Attn: Davor Rukavina  
500 N. Akard St., Ste. 3800  
Dallas, Texas 75201

In answering these Interrogatories, the Defendant required to review all information available to it, including, but not limited to, information in the possession of its attorneys or their investigators or in the possession of its advisors, agents, or associates, or any other information in its possession, custody, or control.

The Defendant's answers to these Interrogatories shall be verified as required by Rule 33.

## **II. DEFINITIONS**

“And” means and/or.

“FFT” means Frinzi Family Trust.

“Identify” when used in reference to a person, means to give, to the extent known, the person's full name, present or last known address, e-mail address, and telephone number, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

“Identify” when used in reference to a document, means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s), and recipient(s).

“Relate” or “refer” or “relating” or “referring,” mean in any way to comprise, constitute, describe, discuss, evidence, identify, memorialize, reflect, support, refute, make a statement about, deal with, consist of, refer to, relate to, pertain to, or being in any way logically or factually connected with, in whole or in part, the subject matter of the discovery request.

“You” and “Yours” refer to Multiband Global Resources, LLC and includes any of its agents acting within the scope of their agency.

### **III. INTERROGATORIES**

#### **INTERROGATORY NO. 1**

How much was paid to acquire the stock in American Metals Recovery and Recycling, Inc. n/k/a MBG Holdings, Inc. from Repository Services, LLC (or any other entity affiliated with it)?

ANSWER:

#### **INTERROGATORY NO. 2**

Who paid the purchase price referenced in Interrogatory No. 1, when, and how?

ANSWER:

#### **INTERROGATORY NO. 3**

Where did the funds used to make the purchase price referenced in Interrogatory No. 1 originate from, or what was their source, including whether any portion thereof originated initially or subsequently from any of Goodman, GNET ATC, or Multiband?

ANSWER:

INTERROGATORY NO. 4

What consideration or benefit did you, or anyone on your behalf, provide to GNET ATC or anyone else for the December 31, 2021 wire in the amount of \$500,000 from GNET ATC to Stauber Law Firm, including in what amount, when, how, and to whom?

ANSWER:

INTERROGATORY NO. 5

What was the purpose or the reason behind, from your perspective, the transfer of \$4.4 million to you from Multiband on or about January 4, 2022?

ANSWER:

INTERROGATORY NO. 6

Why did you accept or receive the transfer of \$4.4 million to you from Multiband on or about January 4, 2022?

ANSWER:

INTERROGATORY NO. 7

Did you enter into any agreement, including a promissory note, related to the transfer of \$4.4 million to you from Multiband on or about January 4, 2022?

ANSWER:

INTERROGATORY NO. 8

What consideration or benefit did you, or anyone on your behalf, provide to Multiband or anyone else for the transfer of \$4.4 million to you from Multiband on or about January 4, 2022, including in what amount, when, how, and to whom?

ANSWER:

INTERROGATORY NO. 9

Why did you purchase the real property located at 521 N. Horseshoe Bay Blvd., Horseshoe Bay, Texas, and certain real property consisting of approximately .7 acres, and identified as Lot 44 at the La Serena Loop, Horseshoe Bay, Texas 78657?

ANSWER:

INTERROGATORY NO. 10

How did you pay the price to purchase the real property located at 521 N. Horseshoe Bay Blvd., Horseshoe Bay, Texas, and certain real property consisting of approximately .7 acres, and identified as Lot 44 at the La Serena Loop, Horseshoe Bay, Texas 78657, such as from cash or the proceeds of a loan, and if cash, where you got the money from and if loan, who you obtained the loan from.

ANSWER:

INTERROGATORY NO. 11

Why did you transfer the real property located at 521 N. Horseshoe Bay Blvd., Horseshoe Bay, Texas, and certain real property consisting of approximately .7 acres, and identified as Lot 44 at the La Serena Loop, Horseshoe Bay, Texas 78657, to FFT, and what benefit or consideration did you receive as a result of the same (and from whom)?

ANSWER:

INTERROGATORY NO. 12

Who (as in which person(s)), for you and also for FFT, or on your behalf and on FFT's behalf, negotiated and agreed to the transfer of the real property located at 521 N. Horseshoe Bay Blvd., Horseshoe Bay, Texas, and certain real property consisting of approximately .7 acres, and identified as Lot 44 at the La Serena Loop, Horseshoe Bay, Texas 78657 by you to FFT?

ANSWER:

INTERROGATORY NO. 13

Why did you enter into that certain asset purchase agreement effective August 21, 2022 with American Metals Recovery and Recycling, Inc. n/k/a MBG Holdings, Inc. from Repository Services, LLC, including what return consideration did you receive for that agreement?

ANSWER:

INTERROGATORY NO. 14

Did Goodman, GNET ATC, LLC, and/or Multibrad Field Services, Inc. owe you any money on account of which GNET ATC transferred \$962,000 to you on or about December 30, 2021 and, if so, how much and pursuant to what agreement?

ANSWER:

INTERROGATORY NO. 15

What consideration or benefit did you, or anyone on your behalf, provide to GNET ATC or anyone else for the transfer \$962,000 to you on or about December 30, 2021, including in what amount, when, how, and to whom?

ANSWER:

INTERROGATORY NO. 16

Why did you enter into the *Subcontract Services Agreement* with GNET ATC dated December 31, 2021, and what benefit or consideration did you provide to GNET ATC for and under that contract?

ANSWER:

INTERROGATORY NO. 17

Identify by name each employee of yours you had as of December 31, 2021 to provide services under that certain *Subcontract Services Agreement* with GNET ATC, and when such employee became an employee of yours, and when such employee ceased being an employee of yours.

ANSWER:

INTERROGATORY NO. 18

State what revenue you received or were paid, including any unpaid accounts receivable, from, on account of, or related to that certain *Subcontract Services Agreement* dated December 31, 2021 between GNET ATC and MGR, and from which source, including from the End Customer (as defined therein).

ANSWER:

INTERROGATORY NO. 19

What is the current status of that certain *Subcontract Services Agreement* dated December 31, 2021 between GNET ATC and MGR and the Underlying Contract (as defined therein) and, if either have been terminated, cancelled, not renewed, assigned, or transferred, state when, why, and to whom.

ANSWER:

INTERROGATORY NO. 20

Identify in detail and with specificity each action, fact, omission, or allegation you contend supports your Affirmative Defense No. 2 of “unclean hands or other inequitable conduct,” including who, when, and how engaged in unclean hands or other inequitable conduct and the nexus or link between the same and the Plaintiffs’ claims being barred.

ANSWER:

INTERROGATORY NO. 21

Identify in detail and with specificity each action, fact, omission, or allegation you contend supports your Affirmative Defense No. 3 of “estoppel,” including who, when, and how engaged in conduct or omissions leading to estoppel, and the nexus or link between the same and the Plaintiffs’ claims being barred.

ANSWER:

INTERROGATORY NO. 22

Identify in detail and with specificity each action, fact, omission, or allegation you contend supports your Affirmative Defense No. 4 of “waiver,” including who waived anything, when, and how, and what was waived.

ANSWER:

INTERROGATORY NO. 23

Identify in detail and with specificity each action, fact, omission, or allegation you contend supports your Affirmative Defense No. 5 of “ratification,” including who ratified what, when, and how.

ANSWER:

INTERROGATORY NO. 24

Identify in detail and with specificity each action, fact, omission, or allegation you contend supports your Affirmative Defense No. 6 of “the business judgment rule,” including the considerations taken and rationale underlying each of the contested actions.

ANSWER:



Dated at Dallas Texas this 11th day of August, 2023.

**MUNSCH HARDT KOPF & HARR P.C.**

/s/ Davor Rukavina

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**ATTORNEYS FOR THE PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 11th day of August, 2023, he caused a true and correct copy of this document to be served on counsel of record for all parties in this Adversary Proceeding, by e-mail and by U.S. first class mail, postage prepaid, as follows:

Jason M. Rudd, Esq.  
Wick Phillips Gould & Martin, LLP  
3131 McKinney Avenue, Suite 500  
Dallas, TX 75204

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[dgreen@mwe.com](mailto:dgreen@mwe.com)

/s/ Davor Rukavina

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Davor Rukavina, Esq.